



United States Department of Justice

United States Attorney
District of Connecticut

Connecticut Financial Center
157 Church Street, 25th Floor
New Haven, Connecticut 06510

(203) 821-3700
Fax (203) 773-5376
www.justice.gov/usao/ct

February 4, 2019

City of Bridgeport
Attn: Office of the City Attorney
999 Broad Street, 2nd Floor
Bridgeport, CT 06604

Re: **Non-Disclosure of Subpoena**

Dear Custodian of Records:

The attached grand jury subpoena issued on February 4, 2019 is returnable on February 12, 2019 before the federal grand jury sitting that date in New Haven, Connecticut.

The subpoena requests that the custodian of records produce certain documents described in the Attachment A. In lieu of appearing before the grand jury, the Custodian of Records may comply with the subpoena by producing the responsive records SA Paul M. Takla, Federal Bureau of Investigation, 1000 Lafayette Boulevard, Suite 306, Bridgeport, CT 06604, on or before the grand jury date.


Title 12, United States Code, Section 3413(i), exempts subpoenas issued by a Federal Grand Jury from the disclosure provisions of the Right to Financial Privacy Act of 1978. You are requested not to disclose the existence of this subpoena or its contents. Disclosure of the subpoena, or its contents, may impede an ongoing federal grand jury investigation into the possible commission of a felony, and consequently may interfere with the enforcement of federal law. **Therefore, before you disclose the existence and/or the contents of this subpoena, please contact Special Agent Takla at 203-382-6667.**

We also request that the custodian of records at your institution complete the attached declaration for any business records that are produced pursuant to this subpoena, to the extent that such records meet the conditions set forth in the declaration—that is, (1) that the records were made at or near the time of the occurrence of the matters set forth in the records, by a person with knowledge of those matters or from information transmitted by such a person, and (2) that these records are made, and are kept, as a regular practice in the ordinary course of business.

Completion of this declaration will significantly reduce the chances that you will be called as a witness at any future trial, where these documents might be offered as evidence.

Very truly yours,

JOHN H. DURHAM
UNITED STATES ATTORNEY


JONATHAN N. FRANCIS
ASSISTANT UNITED STATES ATTORNEY



U.S. DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION

Paul M. Takla
Special Agent

1000 Lafayette Blvd.
Suite 306
Bridgeport, CT 06604

Telephone: (203) 382-6667
Cell: (646) 341-0467
Email: paul.takla@ic.fbi.gov

UNITED STATES DISTRICT COURT

for the
District of Connecticut

GJ N-18-2-151(34)
S/A Paul Takla, FBI

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: City of Bridgeport
Attn: Office of the City Attorney
999 Broad Street, 2nd Floor
Bridgeport, CT 06604

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: Robert N. Giaimo Federal Building
150 Court Street, Room 125
New Haven, CT 06510

Date and Time: Grand Jury Room
February 12, 2019 at 9:00 a.m.

You must also bring with you the following documents, electronically stored information, or objects (*blank if not applicable*):

See Attachment A.

Note: Please include a copy of this subpoena with any materials or records produced. In lieu of personally appearing, these records may be provided to SA Paul M. Takla, Federal Bureau of Investigation, 1000 Lafayette Boulevard, Suite 306, Bridgeport, CT 06604, telephone number (203) 382-6667, e-mail address pmtakla@fbi.gov, before the Grand Jury date.

Date: 02/04/2019

CLERK OF COURT



Signature of Clerk or Deputy Clerk

The name, address, e-mail, and telephone number of the United States attorney, or assistant United States attorney, who requests this subpoena, are:

Jonathan N. Francis, Assistant United States Attorney
U.S. Attorney's Office, District of Connecticut
157 Church Street, 25th Fl.
New Haven, CT 06510 Tel. 203-821-3700 Control No. 1135

ATTACHMENT A - GRAND JURY N-18-2-151(34) – Page 1 of 1

TO: City of Bridgeport
Attn: Office of the City Attorney
999 Broad Street, 2nd Floor
Bridgeport, CT 06604

RECORDS REQUESTED:

1. For the period January 1, 2015 to November 8, 2018, please provide any and all documents, records and communications related to the sale of the City of Bridgeport's scrap metal. This includes reports, complaints, contracts, agreements, bids, invoices, receipts, payments, records of meetings, emails, text messages, voicemails, and other correspondence. Please do not include in your response any materials from the Labor Relations Department's investigative files or that were created during the investigation undertaken by Senior Labor Relations Officer Philip J. White after October 2018, including any reports, communications, or interview notes or recordings.
2. For the period January 1, 2015 to the present, please provide all records and communications concerning the following:
 - a. G. Pic and Sons Construction Company;
 - b. Seaview Equipment Sales & Rental; and
 - c. Vaz Quality Works LLC.

This includes reports, complaints, contracts, agreements, bids, invoices, receipts, payments, records of meetings, emails, text messages, voicemails, and other correspondence.

RECORDS FORMAT:

Records are requested in the form of electronic media. Please see attached instructions for Production of Electronically Stored Records.

IN LIEU OF YOUR PERSONAL APPEARANCE BEFORE THE GRAND JURY, subpoenaed materials may be sent to SA Paul M. Takla, Federal Bureau of Investigation, 1000 Lafayette Boulevard, Suite 306, Bridgeport, CT 06604, telephone number (203) 382-6667, e-mail address pmtakla@fbi.gov.

CERTIFICATE OF RECORDS

I, _____, hereby certify that:

1. I am the custodian of records at _____ ("the Company"), located at _____.
2. I have examined the records of the Company, and they contain the attached documents, each of which is the original or the duplicate of the original records, described more particularly as

3. These records were made at or near the time of the occurrence of the matters set forth therein, by a person with knowledge of these matters or from information transmitted by such a person.
4. These records were kept in the course of a regularly conducted activity of the Company.
5. Making these records was a regular practice of that activity.

I certify under penalty of perjury that the foregoing is true and correct.

Executed on _____, in _____, _____
(date) (City) (State)

Name: _____

Address: _____

Telephone number: _____



United States Department of Justice

United States Attorney
District of Connecticut

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY (DIGITAL) STORED RECORDS

This document details the data formatting specifications required for data submitted to the U.S. Attorney's Office (USAO) in response to litigation. The Government currently uses Concordance (ver 10.06) and IPRO (ver 8.6).

ANY VARIANCE FROM THESE STANDARDS MUST BE PRE-APPROVED.

A. MEDIA

All data and image deliveries must be made on CD, DVD, or USB 2.0 external hard drive.

B. DATA FORMAT

Data should be delivered in one of two formats:

1. As a Concordance database (.dcb)

- ❖ In most instances, the StartBates should be the Image Key field unless another field has been designated the key field by the Government.
- ❖ All fields should be indexed.

Note: If this method is chosen, and there will be more than one production, please confirm the database fields and structure remain consistent between data deliveries.

2. As an ASCII delimited text file (.dat)

If this method is chosen, please adhere to the following:

- ❖ The first line of the text file must contain the field names.
- ❖ The delimiters used should be the Concordance standards, of: comma (ASCII character 020), quote (ASCII character 254), and newline (ASCII character 174).
- ❖ Produce a page header indicator in the following format, <<batesno>>, on a separate line for every page of OCR.

C. **DELIVERED FIELDS**

The database or load file provided must contain, at minimum, the first and last Bates number for each document, and all applicable OCR text. OCR text should be incorporated directly in either the Concordance database or the ASCII load file, and not delivered in separate text files.

D. **IMAGE/CROSS REFERENCE FILE GUIDELINES**

I. **IMAGE FORMAT**

1. **TIFF – Single page (Preferred) OR**

- ❖ Documents should be scanned at 300 dpi, as single-page CCITT Group IV TIFF files. TIFF file names should match the assigned Bates number of the underlying document page, should be unique, and sequentially numbered. PDF files will be accepted only after a consultation between the provider and USAO technical support staff. Multi-page TIFF files are strongly discouraged.
- ❖ Bates numbers should be electronically “endorsed” onto images. The file name assigned to the image should match the underlying document’s Bates number. Bates numbers should be alpha-numeric, with the numeric portion of the stamp being “zero-filled”. As an example, an assigned Bates numbered series of documents such as “ABC1”, “ABC2”, “ABC3” would be unacceptable, whereas “ABC000001”, “ABC000002”, “ABC000003” is preferred.
- ❖ Images should be placed on delivered media in a master folder named XIMAGES.

2. **PDF – Multi-page (text searchable)**

II. **CROSS-REFERENCE FILE**

1. Tiff files must be accompanied with an image “cross-reference file”, preferably in IPRO® .lfp format. This file associates each bates number with its corresponding single-page TIFF file name and indicates its location on the media provided. The file should contain one line for every page in the collection, and must contain the document Bates number and the full DOS path to the image, beginning with the media volume. Below is a sample IPRO file:

```
IM,ABC-000001,D,0,@VOL01;IMG_0000001;ABC-000001.tif;2,0
IM,ABC-000002,,0,@VOL01;IMG_0000001;ABC-000002.tif;2,0
IM,3542-S-000001,D,0,@VOL01;IMG_0000001;3542-S-000001.tif;2,0
IM,3542-S-000002,,0,@VOL01;IMG_0000001;3542-S-000002.tif;2,0
IM,3542-S-000003,,0,@VOL01;IMG_0000001;3542-S-000003.tif;2,0
```

E. NATIVE FILES

With the exception of spreadsheets, electronic files should not be provided in their original or "native" format, but should be put through an electronic conversion (e-conversion) process, in which single-page TIFF images are created from all underlying document pages, and all text and applicable metadata from these files is extracted. Data, images, and image cross-reference files resulting from this process should follow the formatting specifications detailed in the sections above.

Spreadsheets (such Microsoft Excel or Lotus 1-2-3) should be provided in both e-converted and native format.

F. SECURITY

All submissions of electronic data to the USAO must be free of computer viruses. In addition, any passwords protecting files or media must be removed or provided.

Rev. October 2013

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IM,ABC-000002,,0,@VOL01;IMG_0000001;ABC-000002.tif;2,0
IM,3542-S-000001,D,0,@VOL01;IMG_0000001;3542-S-000001.tif;2,0
IM,3542-S-000002,,0,@VOL01;IMG_0000001;3542-S-000002.tif;2,0
IM,3542-S-000003,,0,@VOL01;IMG_0000001;3542-S-000003.tif;2,0
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Rev. October 2013

